

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
COLUMBIA DIVISION

SHAWNEE MATHIS , et al. )  
Plaintiffs, )  
vs. )  
WAYNE COUNTY BOARD OF ) Civil Action No. 1:09-cv-0034  
EDUCATION, ) Judge Trauger  
et al. ) Jury Demanded  
Defendants. )

**AGREED PROTECTIVE ORDER**

It appearing from the signature of counsel for the parties that the Defendant Wayne County Board of Education has or will produce certain educational and related records of certain minor children other than that of the Plaintiffs in this matter in response to requests for production of documents or initial disclosures that are subject to various privacy laws, including, but not limited to the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g and 34 C.F.R. Part 99) and it further appearing that the records should otherwise remain private and not be disclosed to any third person, by whatever mean, it is accordingly ordered as follows:

1. Defendant will provide Plaintiffs' counsel with the permanent file of those certain individuals (identified in the Amended Complaint and original complaint by initials only) requested in response to discovery requests.

2. The production of such records does not in anyway waive the privacy that attached by law.

3. The content, whether by summary or otherwise shall not be disclosed, published or disseminated to any third party except the Plaintiffs, Defendant or their

1 counsel or staff in counsels' office or expert witnesses retained or consulted in connection  
2 with this litigation. Disclosure by such persons to any other third party or persons,  
3 including but not limited to the publication of the same in any electronic form or in any  
4 other form is strictly prohibited.

5       4.     In the event that it is necessary to file any such documents in connection with  
6 these proceedings, such documents shall be deemed confidential and filed under seal and  
7 the persons identified therein shall be referred to by their initials.

8       5.     Violation of this Order is punishable by the contempt powers of this Court  
9 and/or as otherwise provided by law.

## IT IS SO ORDERED.

  
Aleta A. Trauger  
United States District Judge

**AGREED AND APPROVED FOR ENTRY:**

/s/ John D. Schwab  
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